LPDES PERMIT NO. LA0005223, AI No. 1314

LPDES FACT SHEET and RATIONALE

FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM (LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA

I. Company/Facility Name: Rhodia Inc.

Baton Rouge Plant Post Office Box 828

Baton Rouge, Louisiana 70821

II. Issuing Office: Louisiana Department of Environmental Quality

(LDEQ)

Office of Environmental Services

Post Office Box 4313

Baton Rouge, Louisiana 70821-4313

III. Prepared By: Sonja Loyd

Industrial Permits Section Water Permits Division Phone #: (225) 219-3090 E-mail: sonja.loyd@la.gov

Date Prepared: August 11, 2008

IV. Permit Action/Status:

A. Reason For Permit Action:

Proposed reissuance of an expired Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.2301.F, 4901, and 4903.

- B. LPDES permit LPDES permit effective date: May 1, 2004
 LPDES permit modification date: August 1, 2004
 LPDES permit expiration date: April 30, 2009
 EPA has not retained enforcement authority.
- C. Application received on October 5, 2007. Application Addendal received on September 9, 2008, January 23, 2009, and March 18, 2009. Additional information received via e-mail correspondence on February 4, 2009, March 25, 2009, and April 3, 2009. Additional information received via telephone on March 30, 2009.

V. Facility Information:

- A. Location 1275 Airline Highway in Baton Rouge, East Baton Rouge Parish (Latitude 30°32'28", Longitude 91°11'15")
- Applicant Activity According to the application, Rhodia Inc., В. Baton Rouge Plant, is a spent sulfuric acid regeneration facility, commercial hazardous waste incinerator, and vanillin production facility. Activities at the Acid Plant consist of the regeneration of spent sulfuric acid into various grades of sulfuric acid which results in the production of oleum (fuming sulfuric acid) as a byproduct. The spent sulfuric acid is thermally decomposed to sulfur dioxide and the combustible organics are reduced to water and carbon dioxide in highly efficient furnaces authorized under permittee's Resource Conservation and Recovery (RCRA) permit. permittee operates two (2) sulfuric acid regeneration units (SARU) which will be upgraded, as a result of a company-wide compliance agreement, to reduce sulfur dioxide emissions by adding caustic scrubbers to each unit along with additional debottlenecking of the processes to increase spent sulfuric acid regeneration capacity. Due to the current economic climate, the facility proposes to implement the upgrades in four phases instead of two phases. Phase I will include the SO_2 abatement for Unit No. 2. Phase II will include the SO_2 abatement for Unit No. 1. Phase III will include the SO₂ abatement for Unit No. 2 along with the debottlenecking project. Phase IV will include, the SO_2 abatement for Unit. No. 1 along with the debottlenecking project.

The vanillin production facility (Cathyval Plant) is separate from and independent of the sulfuric acid production facility. The vanillin production facility manufactures synthetic vanillin and ethyl vanillin (Vanessa Unit), guaiacol and guetol (Daphne Unit), hydroquinone and catechol (Cathy Unit).

C. Technology Basis - (40 CFR Chapter 1, Subchapter N/Parts 401, 405-415, and 417-471 have been adopted by reference at LAC 33:IX.4903)

Guideline
Organic Chemicals, Plastics,
and Synthetic Fibers

<u>Reference</u>

40 CFR 414, Subparts H, I, and

Waste Combustors

40 CFR 444, Subpart A

The permittee is also subject to the effluent guidelines at 40 CFR 415 (Inorganic Chemicals), Subparts U (Sulfuric Acid Production) and BI (Sulfur Dioxide Production). However, these guidelines are currently reserved and do not contain actual limits or requirements.

Other sources of technology based limits:
Current LPDES permit (effective May 1, 2004)
1996 NPDES permit (effective November 1, 1996)
LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)
LDEQ Sanitary General Permits
Best Professional Judgement

- D. Fee Rate -
 - 1. Fee Rating Facility Type: Major,
 - 2. Complexity Type: . VI
 - 3. Wastewater Type: II
 - 4. SIC codes: 2819, 2869, and 4953
- E. Continuous Facility Effluent Flow (Outfalls 001, 002, and 003) -2.415 MGD (Baseline Conditions), 2.441 MGD (Phase I), 2.489 MGD (Phase II), 2.472 MGD (Phase III), and 2.495 MGD (Phase IV)
- VI. Receiving Waters: Mississippi River (Outfalls 001, 002, 003, 004, and 016) and Monte Sano Bayou (Outfalls 014 and 015)
 - 1. TSS (15%), mg/L: 53.25
 - 2. Average Hardness, mg/L CaCO3: 154
 - 3. Critical Flow, cfs: 141,955
 - 4. Mixing Zone Fraction: 1/3
 - 5. Harmonic Mean Flow, cfs: 366,748
 - 6. River Basin: Mississippi River, Subsegment Nos. 070201 (Outfalls 001, 002, 003, 004, and 016) and 070504 (Outfalls 014 and 015)
 - 7. Designated Uses:

Subsegment No. 070201

The designated uses are primary contact recreation, secondary contact recreation, fish and wildlife propagation, and drinking water supply

Subsegment No. 070504

The designated uses are secondary contact recreation and limited aquatic life and wildlife use.

Information based on the following: LAC 33:IX Chapter 11 and memorandum from Todd Franklin to Sonja Loyd dated July 21, 2008. Hardness and 15% TSS data were taken from ambient monitoring station #318 on the Mississippi River south of St. Francisville, Louisiana.

VII. Outfall Information:

Outfall 001

- A. Type of wastewater treated combined process wastewater (Acid Plant) including furnace scrubber wastewater; washwater and process area stormwater runoff [comprised of effluent from the following areas: Units 1 and 2 furnace containment, Treatment Services Sumps, 20 Storage Sump including rinse water from the IFS operations, West End Sump, Trailer Staging Area Sump, and Outfall 001 Effluent Treatment Plant Sump (including effluent from Outfall 002 if necessary)]; utility wastewater; maintenance wastewaters (comprised of wastewater generated from the washing of fresh and spent acid pipelines, trucks, railcars, and storage tanks, acid lab wastewater, fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); and hydrostatic test wastewater
- B. Location at the point of discharge near the flow measuring device installed downstream of the 001 Effluent Treatment Plant prior to combining with the waters of the Mississippi River at Latitude 30°30'46", Longitude 91°11'17".
- C. Treatment treatment of process wastewaters consists of:
 - neutralization
 - chemical precipitation
 - flocculation
 - coagulation
- D. Flow Continuous, Long Term Average for all phases:
 - 0.393576 MGD (Baseline Conditions)
 - 0.419496_MGD_(Phase_I_- Phase_I_SO2_Abatement)____
 - 0.467016 MGD (Phase II Phase II SO₂ Abatement)
 - 0.449736 MGD (Phase III $\stackrel{!}{\sim}$ Phase I SO_2 Abatement including the debottlenecking project)
 - 0.472776 MGD (Phase IV Phase II SO₂ Abatement including the debottlenecking project)

Baseline Conditions

Process Wastewater* 0.385576 MGD
Caustic for neutralization 0.008 MGD

<u>Phase I</u>

Process Wastewater* 0.411496 MGD
Caustic for neutralization 0.008 MGD

Phase II

Process Wastewater* 0.459016 MGD Caustic for neutralization, 0.008 MGD

Phase III

Process Wastewater* 0.441736 MGD Caustic for neutralization 0.008 MGD

Phase IV

Process Wastewater* 0.464776 MGD Caustic for neutralization 0.008 MGD

- * Specific component waste streams are defined at Appendices A-1 through A-5._
- E. Receiving waters Mississippi River
- F. Basin and subsegment Mississippi River Basin, Subsegment No. 070201

Outfall 002

- A. Type of wastewater treated combined cooling tower blowdown; process area stormwater runoff; mechanical equipment cooling water; SO₃ (Oleum) tank scrubber wastewater; miscellaneous cooling water; washdown; condensate; car wash wastewater; maintenance wastewaters (comprised of fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); hydrostatic test wastewater; and previously monitored wastewater from Internal Outfall 102 (treated sanitary wastewater)
- B. Location at the point of discharge in the northeast corner of the Acid Plant drainage area for Outfall 002 prior to combining with the waters of the Mississippi River at Latitude 30°30'38", Longitude 91°11'18".
- D. Flow Continuous, 1.0612 MGD (Long Term Average)

Process area stormwater 0.163 MGD SO₃ scrubber 0.003 MGD Utility Wastewater 0.618 MGD Miscellaneous 0.2672 MGD Sanitary Wastewater 0.01 MGD

- E. Receiving waters Mississippi River
- F. Basin and subsegment Mississippi River Basin, Subsegment No. 070201

Internal Outfall 102

- A. Type of wastewater treated sanitary wastewater
- B. Location at the point of discharge from the 15,000 GPD capacity extended aeration package plant prior to combining with the effluent of Outfall 002 at Latitude 30°30'37", Longitude 91°11'17".
- C. Treatment treatment of sanitary wastewaters consists of:
 - .- package treatment plant_with activated sludge
 - chlorination
 - neutralization
- D. Flow Continuous, 0.01 MGD (Long Term Average)
- E. Receiving waters Mississippi River via Outfall 002
- F. Basin and subsegment Mississippi River Basin, Subsegment No. 070201

Outfall 003

- A. Type of wastewater treated combined process wastewater (Cathyval Plant) which includes the Vanessa, Daphne, and Cathy Units; process area stormwater runoff; cooling tower blowdown; laboratory wastewater (Cathyval Plant); maintenance wastewaters (comprised of fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); non-process area stormwater (on an emergency basis only); and hydrostatic test wastewater
- B. Location at the point of discharge from the 003 Wastewater Treatment Unit prior to combining with the waters of the Mississippi River at Latitude 30°30'43", Longitude 91°11'33".
- C. Treatment treatment of process wastewaters consists of:
 - neutralization
 - activated sludge
 - sedimentation
 - belt filtration
 - rapid sand filtration
- D. Flow Continuous, 0.9607 MGD (Long Term Average)

Process Wastewater* 0.7483 MGD Utility Wastewater* 0.069 MGD Non-process Area Stormwater* 0.1434 MGD

* Specific component waste streams are defined at Appendix A-4.

- E. Receiving waters Mississippi River
- F. Basin and subsegment Mississippi River Basin, Subsegment No. 070201

Outfall 004

- A. Type of wastewater non-process area stormwater runoff from the Cathyval Plant; maintenance wastewaters (comprised of fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); and previously monitored wastewater from Internal Outfall 117 (hydrostatic test wastewater)
- B. Location at the point of discharge from the 004 collection sump prior to combining with the waters of the Mississippi River at Latitude 30°30'39", Longitude 91°11'29".
- C. Treatment None
- D. Flow Intermittent, 0.1434 MGD (Long Term Average)
- E. Receiving waters Mississippi River
- F. Basin and subsegment Mississippi River Basin, Subsegment No. 070201

Outfall 014

- A. Type of wastewater non-process area stormwater runoff; maintenance wastewaters (comprised of well water, fire protection system test water, wastewater from the eye wash and stations safety showers, and cooling tower drift); and previously monitored wastewater from Internal Outfall 117 (hydrostatic test wastewater)
- B. Location at the point of discharge from the southeast corner of the property west of the railroad tracks prior to combining with the waters of Monte Sano Bayou at Latitude 30°30'28", Longitude 91°11'04".
- C. Treatment None
- D. . Flow Intermittent, 0.082 MGD (Long Term Average)
- E. Receiving waters Monte Sano Bayou
- F. Basin and subsegment Mississippi River Basin, Subsegment No. 070504

Outfall 015

- A. Type of wastewater non-process area stormwater runoff; maintenance wastewaters (comprised of well water, fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); and previously monitored wastewater from Internal Outfalls 215 (treated sanitary wastewater) and 117 (hydrostatic test wastewater)
- B. Location at the point of discharge from the southeast corner of the property east of the railroad tracks prior to combining with the waters of Monte Sano Bayou at Latitude 30°30'31", Longitude 91°10'55".
- C. Treatment None
- D. Flow Intermittent, 0.426 MGD (Long Term Average)
- E. Receiving waters Monte Sano Bayou
- F. Basin and subsegment Mississippi River Basin, Subsegment No. 070504

Internal Outfall 215

- A. Type of wastewater treated sanitary wastewater
- B. Location at the point of discharge from the 1,000 GPD capacity extended aeration package plant servicing the office trailer prior to combining with the effluent of Outfall .015 at Latitude 30°30'40", Longitude 91°11'05".
- F. Treatment treatment of sanitary wastewaters consists of:
 - package treatment plant with activated sludge
 - chlorination
 - neutralization
- D. Flow Intermittent, 0.00022 MGD (Long Term Average)
- E. Receiving waters Monte Sano Bayou via Outfall 015
- F. Basin and subsegment Mississippi River Basin, Subsegment No. 070504

Outfall 016

- Λ. Type of wastewater treated sanitary wastewater
- B. Location at the point of discharge from the 100 GPD capacity extended aeration package plant servicing the operator control room at the dock prior to combining with the waters of the Mississippi River at Latitude 30°30'45", Longitude 91°11'42".
- .C. Treatment. treatment. of sanitary wastewaters consists of:
 - package treatment plant with activated sludge
 - chlorination
 - neutralization
- D. Flow Intermittent, 0.0001 MGD (Long Term.Average)
- E. Receiving waters Mississippi River
- F. Basin and subsegment Mississippi River Basin, Subsegment No. 070201

Internal Outfall 117

- A. Type of wastewater hydrostatic test wastewater
- B. Location At the point of discharge from the vessel or pipeline being tested prior to combining with the effluent at any of the external outfalls (with the exception of Outfall 016).
- C. Treatment None
- D. Flow De minimis _____
- E. Receiving waters Mississippi River and Monte Sano Bayou
- F. Basin and Subsegments Mississippi River, Subsegment Nos. 070201 and 070504

VIII. Proposed Permit Limits:

Summary of Proposed Changes From the Current LPDES Permit:

A. Outfall 001

The description of the wastestream will be changed to read as: "treated combined process wastewater (Acid Plant) including furnace scrubber wastewater; washwater and process area stormwater runoff [comprised of effluent from the following areas: Units 1 and 2 furnace containment, Treatment Services Sumps, 20 Storage Sump

including rinse water from the IFS operations, West End Sump, Trailer Staging Area Sump, and Outfall 001 Effluent Treatment Plant Sump (including effluent from Outfall 002 if necessary)]; utility wastewater; maintenance wastewaters (comprised of wastewater generated from the washing of fresh and spent acid pipelines, trucks, railcars, and storage tanks, acid lab wastewater, fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); and hydrostatic test wastewater".

The daily maximum and monthly average technology-based mass limits for the conventional, non-conventional, and toxic pollutants did not change based on actual flow rates provided in the 2007 Application for the baseline conditions (with the exception of the daily maximum limit for 1,2-Dichloroethane - see below for explanation). However, the mass limits for these pollutants will be changed as a result of the projected increases in the flow rates under all of the phases based on information provided in the 2007 Application (water balance diagram), March 13, 2009 Application Addendum, and March 30, 2009 Record of Communication. See Appendices A-1 through A-5.

The daily maximum limit for 1,2-Dichloroethane was inadvertently listed in the current permit as 1.58 lbs/day instead of 1.85 lbs/day. The technology spreadsheet (Appendix A-1) associated with the 2003 Fact Sheet listed a daily maximum limit of 1.85 lbs/day for this pollutant. Therefore, this limit will be changed to reflect 1.85 lbs/day under the baseline conditions in the draft permit.

The permittee requested that the monitoring requirements for Total Mercury using the trace metal techniques (USEPA Methods 1631 and 1669) be removed from the draft permit. Therefore, since Subsegment No. 070201_is_not listed as being_impaired on the 2006_Integrated 303(d) List, the request to remove the monitoring requirements for Total Mercury using trace metal techniques will be granted.

The annual monitoring requirements for Parachlorometacresol will be removed from the draft permit based on Discharge Monitoring Report (DMR) sample data for the period of December 2004 through December 2008 demonstrating that this pollutant has not been detected.

The permittee's request for a monitoring frequency reduction for TOC, TSS, Sulfite, and Oil and Grease from three times per week to once per week will be granted in accordance with the <u>Interim Guidance for Performance-Based Reduction of NPDES Permit Monitoring Frequencies (April 1996)</u> based on information provided in the 2007 Application. See Appendix D for the Monitoring Frequency Reduction Analysis.

B. Outfall 002

The description of the wastestream will be been changed to read as: "treated combined cooling tower blowdown; process area stormwater runoff; mechanical equipment cooling water; SO₃ (Oleum) tank scrubber wastewater; miscellaneous cooling water; washdown; condensate; car wash wastewater; maintenance wastewaters (comprised of fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); hydrostatic test wastewater; and previously monitored wastewater from Internal Outfall 102 (treated sanitary wastewater)".

Hydrostatic test wastewater was previously established as a wastestream at this outfall in the 2003 Fact Sheet. However, this wastestream was inadvertently not included in the current permit. This wastestream will be included in the outfall description for this outfall in the draft permit.

The monitoring requirements for Total Mercury will be removed from the draft permit. This requirement was established in the current permit to gather data for the purposes of TMDL development. Therefore, since Subsegment No. 070201 is not listed as being impaired on the 2006 Integrated 303(d) List, the monitoring requirements for Total Mercury will be removed from the draft permit.

A daily maximum and monthly average concentration limit for Total Zinc will be established using the 95th and 99th percentile (log normal distribution of the data set) by BPJ based on sample data reported on the permittee's DMRs for the period of June 2004 through December 2008. The monitoring frequency will be once per month using a 24-hour Composite sample. See Appendix F.

The permittee's request for a monitoring frequency reduction for Oil and Grease from once per week to once per two months in accordance with the Interim Guidance for Performance-Based Reduction of NPDES Permit Monitoring Frequencies (April 1996) will be partially granted per department discretion. The monitoring frequency for Oil and Grease will be changed to reflect once per month in lieu of once per week. See Appendix D for the Monitoring Frequency Reduction Analysis.

C. <u>Internal Outfall 102</u>

A footnote will be added to change the statistical basis for the Fecal Coliform limit from a weekly average to a daily maximum based on current guidance.

D. Outfall 003

The description of the wastestream will be changed to read as: "treated combined process wastewater (Cathyval Plant) which includes the Vanessa, Daphne, and Cathy Units; process area stormwater runoff; cooling tower blowdown; laboratory wastewater (Cathyval Plant); maintenance wastewaters (comprised of fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); non-process area stormwater (on an emergency basis only); and hydrostatic test wastewater".

Hydrostatic test wastewater was previously established as a wastestream at this outfall in the 2003 Fact Sheet. However, this wastestream was inadvertently not included in the current permit. This wastestream will be included in the outfall description for this outfall in the draft permit.

The 2003 LPDES Fact Sheet listed that the permittee is subject to the Best Practicable Control Technology Currently Available (BPT) and Best Available Technology Economically Achievable (BAT) effluent guidelines cited at 40 CFR 414, Subparts H and I. However, based on information obtained from the Electronic Document Management System (EDMS) (Memorandum and attachments re: New Source Determination for the Vanillin Production Facility, dated December 21, 1988), the vanillin production facility was designated as a new source facility since it was constructed after the promulgation date of the New Source Performance Standards (NSPS). Therefore, the technology-based standards applicable to this facility will be changed to reflect the NSPS in this fact sheet. This finding does not result in a change to the concentration limits used to calculate the mass limits in the draft permit.

The monitoring requirements for Phosphorus will be removed from the draft permit based on the 2006 Integrated 303(d) List which did not list Subsegment No. 070201 as being impaired. The LDEQ is aware of the occurrence of a low oxygen hypoxic or "dead zone" in the Gulf of Mexico and its relationship to nutrients and fresh water from the Mississippi River. As a result, the LDEQ has developed a criteria development plan for state waters in coordination with EPA to create defensible nutrient criteria based on the best available science. Work on criteria for the Mississippi River is an ongoing effort and will require further scientific investigation because of the complex nature of the large Mississippi River watershed which includes over 30 states and two Canadian Provinces. A reopener clause will be established in the permit in accordance with LAC 33:IX.2903 which allows LDEQ to modify, or alternatively, revoke and reissue the permit to comply with any more stringent nutrient limits or requirements that are promulgated in the future.

A monitoring requirement for Total Cobalt will be added for data gathering purposes since the permittee uses a cobalt-containing catalyst in the manufacturing process at the Vanillin Plant (specifically, the Vanessa Unit). The monitoring frequency will be once per quarter using a 24-hour composite sample.

The monitoring requirement for Total Titanium will be removed from the draft permit based on the following: (1) the permittee indicated in the Application Addendum dated January 16, 2009, that "there is no known source of titanium at Outfall 003"; (2) this pollutant is not a priority metal; (3) there is no water quality standard for this pollutant; and (4) this pollutant is not a guideline parameter.

The permittee requested that the monitoring requirements for Total Mercury using the trace metal techniques (USEPA Methods 1631 and 1669) be removed from the draft permit. Therefore, since Subsegment No. 070201 is not listed as being impaired on the 2006 Integrated 303(d) List, the request to remove the monitoring requirements for Total Mercury using trace metal techniques will be granted.

The wording under the "miscellaneous wastewater" heading was changed to reflect "non-process area stormwater" in lieu of "non-process area stormwater and firewater" on page 1 of Appendix A.

The permittee's request for a monitoring frequency reduction for BOD, and TOC from three times per week to once per week will be granted in accordance with the <u>Interim Guidance for Performance-Based Reduction of NPDES Permit Monitoring Frequencies (April 1996)</u> based on information provided in the 2007 Application. However, a monitoring frequency reduction will not be granted for TSS due to the occurrence of TSS effluent violations at this outfall. See Appendix D for the Monitoring Frequency Reduction Analysis.

E. <u>Outfalls 001, 002, and 003</u>

The Whole Effluent Toxicity (WET) testing dilution series for Freshwater Acute biomonitoring will be changed to reflect 0.03%, 0.05%, 0.06%, 0.08%, and 0.1% (with 0.08% defined as the biomonitoring critical dilution) for Outfalls 001, 002, and 003. The monitoring frequency shall be once per year using a 24-hour composite sample. This revision is based on a recommendation from the Technical Support Section in accordance with the Permitting Guidance Document for Implementing Louisiana Surface Water Ouality Standards, LDEQ, April 16, 2008. The proposed biomonitoring requirements were developed in accordance with U.S. Environmental Protection Agency, Region 6 (USEPA) policy and biomonitoring protocol which is being established in all major permits as a part of the permit reissuance process. Updated Part II Conditions for

the biomonitoring requirements will be established in the draft permit. See Appendix C for the Biomonitoring Recommendation.

F. Qutfall 004

The description of the wast estream will be changed to read as: "non-process area stormwater runoff from the Cathyval Plant; maintenance wastewaters (comprised of fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); and previously monitored wastewater from Internal Outfall 117 (hydrostatic test wastewater)".

G. Outfall 014

The description of the wastestream will be changed to read as: "non-process area stormwater runoff; maintenance wastewaters (comprised of well water, fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); and previously monitored wastewater from Internal Outfall 117 (hydrostatic test wastewater)".

H. Outfall 015

The description of the wastestream will be changed to read as: "non-process area stormwater runoff; maintenance wastewaters (comprised of well water, fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); and previously monitored wastewater from Internal Outfalls 215 (treated sanitary wastewater) and 117 (hydrostatic test wastewater)".

The_permittee_has_requested_to_add.stormwater_discharges_from_a_new Trailer Staging Area (TSA) which will be included in the areas discharging non-process area stormwater runoff to this outfall. The TSA will serve to only stage trailers. There will be no process activities such as transfers or sampling performed at the TSA. Any liquids (including stormwater), leaks, drips, or other releases from the tanker trailers will drain via underground piping to a concrete sump. Liquids draining to the sump will be removed immediately upon discovering any spillage from tanker trailers or within 72 hours of collecting stormwater. The permittee will visually inspect and sample the sump contents for compliance with a COD limit of 125 mg/L and pH limits of 6.0 - 9.0 s.u. prior to discharging any of the sump contents to a drainage point which flows to this outfall. The COD limit of 125 mg/L is being required in lieu of the TOC limit of 50 mg/L for discharges from the sump since the effluent in the sump has the potential to contain inorganic compounds which may not be detected when analyzing for TOC.] In the event that the contents of the sump are not in compliance with the limits listed above, the

sump contents will be removed and managed either through Outfall 001 or placed in a permitted hazardous waste storage tank for incineration. Potential contamination from stormwater runoff will be minimized by the fact that the permittee will be required to sample the sump contents and achieve compliance prior to discharge through this outfall. Part II requirements will be added under the facility specific Storm Water Pollution Prevention Plan (SWP3) Conditions in the draft permit to this effect.

A daily maximum concentration limit for Total Lead will be established in the draft permit since the sample data (260 $\mu g/L$) reported in the permittee's 2007 Application showed that this pollutant is approaching treatable levels. The proposed limit for this pollutant is based on BPJ using the concentration limit (log normal distribution) derived from the Development Document for Effluent Limitation Guidelines and Standards for the Inorganic Chemicals Manufacturing Point Source Category (ICDD), EPA 440/1-82/007. The monitoring frequency will be once per month using a grab sample.

The monitoring frequency for all of the parameters will be changed to reflect once per month instead of once per quarter in the draft permit due to the occurrence of effluent violations at this outfall and the addition of stormwater discharges from the new Trailer Storage Area being included in this outfall's wastestream description.

I. <u>Internal Outfall 115</u>

This internal outfall for treated sanitary wastewater will be removed from the draft permit since the permittee has removed the extended aeration package plant and capped off all facilities associated with this system.

J. <u>Internal Outfall 215</u>

A footnote will be added to change the statistical basis for the Fecal Coliform limit from a weekly average to a daily maximum based on current guidance.

The longitude coordinates for the sampling location were changed from $91^{\circ}11'05"$ to $91^{\circ}11'12"$ based on information received in the Application Addendum dated January 16, 2009.

K. <u>Internal Outfall 117</u>

An internal outfall for hydrostatic test wastewater will be added in the draft permit. The effluent limits and monitoring requirements established at this internal outfall are consistent with the

Hydrostatic Test Wastewater General Permit (LAG670000). The monitoring frequency is once per discharge event using a grab sample. This wastewater may be discharged at any of external outfall (with the exception of Outfall 016) listed in this draft permit.

L. Outfall 016

A footnote will be added to change the statistical basis for the Fecal Coliform limit from a weekly average to a daily maximum based on current guidance.

The coordinates will be changed to reflect Latitude 30°30'45", Longitude 91°11'42" in lieu of Latitude 30°30'17", Longitude 91°11'38" in the draft permit. Based on information provided in the Application Addendum dated January 16, 2009, the permittee stated that this outfall has not been relocated.

- M. The subsegment number for the portion of the Mississippi River receiving discharges from Outfalls 001, 002, 003, 004, and 016 will be changed to reflect 070201 in lieu of 070301. This change is based on information obtained from the LDEQ Geographical Information System (GIS) and the Application Addendum dated January 16, 2009.
- N. Updated Part II Conditions for stormwater discharges associated with industrial activities will be established in the draft permit. In addition, Part II requirements will be added under the facility specific conditions in the draft permit related to the sump associated with the Trailer Staging Area.
- O. The provision in the Part II conditions that required submittal of DMRs to the Capital Regional Office will be removed from the draft permit. All DMRs sent to the Office of Environmental Compliance/Permit Compliance Unit are scanned into EDMS which is accessible to all LDEQ personnel.

IX. Permit Limit Rationale:

The following section sets forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit. Also set forth are any calculations or other explanations of the derivation of specific effluent limitations and conditions, including a citation to the applicable effluent limitation guideline or performance standard provisions as required under LAC 33:IX.2707/40 CFR Part 122.44 and reasons why they are applicable or an explanation of how the alternate effluent limitations were developed.

A. TECHNOLOGY-BASED VERSUS WATER OUALITY STANDARDS-BASED EFFLUENT LIMITATIONS AND CONDITIONS;

Following regulations promulgated at LAC 33:IX.2707.L.2.b/40 CFR Part 122.44(1)(2)(ii), the draft permit limits are based on either technology-based effluent limits pursuant to LAC 33:IX.2707.A/40 CFR Part 122.44(a) or on State water quality standards and requirements pursuant to LAC 33:IX.2707.D/40 CFR Part 122.44(d), whichever are more stringent.

B. TECHNOLOGY-BASED EFFLUENT LIMITATIONS, CONDITIONS, AND MONITORING REQUIREMENTS

Regulations promulgated at LAC 33:IX.2707.A/40 CFR Part 122.44(a) require technology-based effluent limitations to be placed in LPDES permits based on effluent limitations guidelines where applicable, on BPJ (best professional judgement) in the absence of guidelines, or on a combination of the two. The following is a rationale for types of wastewaters. See outfall information descriptions for associated outfall(s) in Section VII. Regulations also require permits to establish monitoring requirements to yield data representative of the monitored activity (LAC 33:IX.2715/40 CFR 122.48(b)] and to assure compliance with permit limitations [LAC 33:IX.2707.I./40 CFR 122.44(I)].

1. Outfall 001 - treated combined process wastewater (Acid Plant) including furnace scrubber wastewater; washwater and process area stormwater runoff [comprised of effluent from the following areas: Units 1 and 2 furnace containment, Treatment Services Sumps, 20 Storage Sump including rinse water from the IFS operations, West End Sump, Trailer Staging Area Sump, and Outfall 001 Effluent Treatment Plant Sump (including effluent from Outfall 002 if necessary)]; utility wastewater; maintenance wastewaters (comprised of wastewater generated from the washing of fresh and spent acid pipelines, trucks, railcars, and storage tanks, acid lab wastewater, fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); and hydrostatic test wastewater!

Rhodia Inc., Baton Rouge Plant is subject to Best Practicable Control Technology Currently Available (BPT) and Best Available Technology Economically Achievable (BAT) effluent limitation guidelines listed at 40 CFR 444, Subpart A below:

<u>Guideline</u>

Inorganic Chemicals

Reference

40 CFR 415, Subparts U and BI

The permittee is subject to the effluent guidelines at 40 CFR 415 (Inorganic Chemicals), Subparts U (Sulfuric Acid Production) and BI (Sulfur Dioxide Production). However, these guidelines are currently reserved and do not contain actual limits or requirements.

Process flow attributed to the -- Spent Sulfuric Acid Regeneration

Waste Combustors
.(Commercial Hazardous Waste Combustor Subcategory)

Process flow attributed to the -i
Combustion of Hazardous Waste

0.29459 MGD (Baseline Conditions), 0.317659 MGD (Phase I), 0.359952 MGD (Phase II), 0.344572 MGD (Phase III), and 0.365078 MGD (Phase IV)

40-CFR 444, Subpart A

.0.03641 MGD (Baseline Conditions), 0.039261 MGD (Phase I), 0.044488 MGD (Phase II), 0.042588 MGD (Phase III), and 0.045122 MGD (Phase IV)

[Note: The process flow attributed to spent sulfuric acid regeneration and the combustion of hazardous waste is 0.331 MGD (Baseline Conditions), 0.35692 MGD (Phase I SO₂ Abatement), 0.40444 MGD (Phase II SO₂ Abatement), 0.38716 MGD (Phase III - Phase I SO₂ Abatement including the debottlenecking project), and 0.4102 MGD (Phase IV - Phase II SO₂ Abatement including the debottlenecking project) based on information provided in the 2007 Application (water balance diagram), March 13, 2009 Application Addendum, and March 30, 2009 Record of Communication. The fraction of the process wastewater attributed to spent sulfuric acid regeneration and the combustion of hazardous waste of 89 percent and 11 percent, respectively, will be continued in the draft permit.]

Organic Chemicals, Plastics, and Synthetic Fibers

Total Process flow -

40 CFR 414, Subpart J

0.385576 MGD (Baseline Conditions),
0.411496 MGD (Phase I), 0.459016 MGD
(Phase_II), 0.441736.MGD (Phase.III),
and 0.464776 MGD (Phase IV)

Calculations, results, and documentation for the technology-based mass limits for the Priority Pollutants based on the baseline conditions and all of the phases are found at Appendices A-1 through A-5 and A-7. See below for site-specific considerations.

These discharges shall receive the following limits and monitoring requirements:

Baseline Conditions

PARAMETER(S)		therwise ted		c/L otherwise	MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY	MONTHLY	DAILY MAXIMUM	
Flow, MGD	Report	Report			Continuous
pH Range Excursions No. of Events >60 minutes	1	:		0 (*1)	Continuous
pH Range Excursions . Monthly Total Accumulated Time in Minutes	·			446. (*1)	Continuous
pH (Standard Units)	! !		Report (*1) (Min)	Report (*1) (Max)	Continuous
TSS	170 i	- 549			1/week
Oil and Grease	32	48			1/week
TOC	161	241			1/week
Sulfite	129	257			1/week
Total Arsenic	0.332	0.578			1/week
Total Cadmium	0.628	1.127			1/week
Total Chromium	0.780	1.389			1/week
Total Copper	1.865	3.321		·	1/week
Total Lead	0.630	1.123			1/week

PARAMETER (S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Total Mercury	0.211	0.377			1/week
Total Silver	0.251	0.446			l/week
Total Titanium	3.909	4.590			1/week
Total Zinc	1.541	2.788			1/week
Acrylonitrile	0.30	0.75			1/year
Benzene	0.18	0.43			1/year
Carbon Tetrachloride	0.46	1.22			1/year
Chlorobenzene	0.46	1.22			1/year
Chloroethane	0.35	0.95		'	1/year
Chloroform	0.36 :	1.05			1/year
1,1-Dichloroethane	0.07	0.19			1/year
1,2-Dichloroethane	0.58	1.85			1/year
1,1-Dichloroethylene	0.07	0.19			1/year
1,2-trans- Dichloroethylene	0.08	0.21			1/year
1,2-Dichloropropane	0.63	2.55			1/year
1,3-Dichloropropylene	0.63	2.55			1/year
Ethylbenzene	0.46	1.22			l/year
Methyl Chloride	0.35	0.95			1/year
Methylene Chloride	0.12	0.55			1/year
Tetrachloroethylene	0.17	0.53			1/year
Toluene	0.09	0.24			1/year

PARAMETER (S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY	MONTHLY AVERAGE	DAILY MAXIMUM	
1,1,1-Trichloroethane	0.07	0.19			1/year
1,1,2-Trichloroethane	- 0.10	0.41			1/year
Trichloroethylene	0.08	0.22			1/year
Vinyl Chloride	0.31	0.55			1/year
2,4-Dimethylphenol	0.06	0.15			1/year
4,6-Dinitro-o-Cresol	0.25	0.89			1/year
2,4-Dinitrophenol	3.88	13.80			1/year
2-Nitrophenol	0.21	0.74			1/year
4-Nitrophenol	0.52	1.85			1/year
Phenol	0.06	0.15			1/year
Acenaphthene	0.06	0.15			1/year
Acenaphthylene	0.06	0.15			1/year
Anthracene	0.06	0.15			1/year
Benzo (a) anthracene	.0.06	0.15			1/year
Benzo (a) pyrene	0.06	0.15			1/year
3,4 Benzofluoranthene	0.06	0.15			1/year
Benzo(k) fluoranthene	0.06	0.15			1/year
Bis(2- ethylhexyl)phthalate	0.31	0.83			1/year
Chrysene	0.06	0.15	·		1/year
1,2-Dichlorobenzene	0.63	2.55			1/year
1,3-Dichlorobenzene	0.46	1.22			1/year
1,4-Dichlorobenzene	0.46	1.22			1/year
Diethyl phthalate	0.15	0.36			1/year

PARAMETER (S)	unless o	LBS/DAY therwise ted	М	otherwise	MEASUREMENT
	MONTHLY	DAILY	MONTHLY	DAILY MAXIMUM	
Dimethyl phthalate	0.06	0.15			1/year
Di-n-butyl phthalate	0.06	0.14			1/year
Fluoranthene	0.07	0.17			1/year
Fluorene	0.06	0.15			1/year
Hexachlorobenzene	0.49	1.18			1/year
Hexachlorobutadiene	0.46	1.22			1/year
Hexachloroethane	0.63	2.55			1/year
Naphthalene	0.06	0.15			1/year
Nitrobenzene	7.19	20.59			1/year
Phenanthrene	0.06 .	0.15			l/year
Pyrene	0.06	0.15			1/year
1,2,4-Trichlorobenzene	0.63	2.55			1/year
Biomonitoring (*2)			See Section D	See Section D	1/year

<u>Phase I</u>

PARAMETER (S)	MASS LBS/DAY CONCENTRATION, unless otherwise MG/L stated unless otherwis stated		MASS LBS/DAY CONCENTRATION unless otherwise MG/L stated stated		MASS LBS/DAY CONCENTRATION unless otherwise MG/L stated unless otherwise stated		LBS/DAY CONCENTRAT otherwise MG/L unless othe		ASS LBS/DAY CONCENTRATION, ess otherwise MG/L stated unless otherwise		MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY	DATLY	MONTHLY AVERAGE	DAILY MAXIMUM	,								
Flow, MGD	Report	Report			Continuous								
pH Range Excursions No. of Events >60 minutes	!			0 (*1)	Continuous								

PARAMETER (S)	MASS LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY	
	MONTHLY	MAXIMUM	MONTHLY	DAILY MAXIMUM		
pH Range Excursions Monthly Total Accumulated Time in Minutes	' '			446 (*1)	Continuous	
pH (Standard Units)	:		Report (*1) (Min)	Report (*1) (Max)	Continuous	
TSS	181	586			1/week	
Oil and Grease	34	51			1/week	
TOC	172	257			1/week	
Sulfite	137 :	275	***		1/week	
Total Arsenic	0.354	0.617			1/week	
Total Cadmium	0.670 ;	1.202			1/week	
Total Chromium	0.831	1.481			1/week	
		,				
TotalCopper	988	3-540				
Total Lead	0.672	1.197			1/week	
Total Mercury	0.225	0.402			1/week	
Total Silver	0.267	0.476			1/week	
Total Titanium	4.167	4.894			1/week	
Total Zinc	1.643	2.973			1/week	
Acrylonitrile	0.32	0.80			1/year	
Benzene	0.20	0.46			l/year	
Carbon Tetrachloride	0.49 ′	1.30			· 1/year	
Chlorobenzene	0.49	1.30			1/year	

PARAMETER (S)	MASS, unless o	therwise	CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Chloroethane	0.38	1.01			1/year
Chloroform	0.38 ,	1.12			1/year
1,1-Dichloroethane	0.08	0.20			1/year
1,2-Dichloroethane	0.62	1.97			1/year
1,1-Dichloroethylene	0.08	0.21			1/year
1,2-trans- Dichloroethylene	0.09	0.23			1/year
1,2-Dichloropropane	0.67	2.72			1/year
1,3-Dichloropropylene	0.67	272			1/year
Ethylbenzene	0.49	1.30			1/year
Methyl Chloride	0.38	1.01			1/year
Methylene Chloride	0.12	0.58			1/year
Tetrachloroethylene	0.18	0.56			1/year
Toluene	0.10	0.25			1/year
1,1,1-Trichloroethane	0.08	0.20			1/year
1,1,2-Trichloroethane	0.11	0.44			1/year
Trichloroethylene	0.09	0.24			1/year
Vinyl Chloride	0.33	• 0.59			1/year
2,4-Dimethylphenol	0.07	0.16			1/year
4,6-Dinitro-o-Cresol	0.27	0.95			1/year
2,4-Dinitrophenol	4.14	14.73			1/year
2-Nitrophenol	0.22	0.79	+ 1		1/year
4-Nicrophenol	0.56	1.98			1/year
Phenol	0.07	0.16		,	1/year

	stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
And the second s	MONTHLY,	DAILÝ MAXIMUM	MONTHLY AVERAGE	DAILY	
Acenaphthene	0.07	0.16			1/year
Acenaphthylene	0.07	0.16			1/year
Anthracene	0.07 ;	0.16		÷	1/year
Benzo (a) anthracene	0.07	0.16			1/year
Benzo (a) pyrene	0.07	0.16			1/year •
3,4-Benzofluoranthene	0.07	0.16			1/year
Benzo(k)fluoranthene	0.07	0.16			1/year
Bis(2- ethylhexyl)phthalate	0.33	0.89			l/year
Chrysene	0.07	0.16			1/year
1,2-Dichlorobenzene	0.67	2.72			1/year
1,3-Dichlorobenzene	0.49	1.30			1/year
1,4-Dichlorobenzene	0.49	1.30			l/year
Diothyl phthalate	0.16	0.39			1/year
Dimethyl phthalate	0.07	0.16			1/year
Di-n-butyl phthalate	0.07	0.15			. 1/year
Fluoranthene	0.08	0.19			1/year
Fluorene	0.07	0.16			1/year
Hexachlorobenzene	0.49	1.18			1/year
Hexachlorobutadiene	0.49	1.30			1/year
Hexachloroethane	0.67 ′	2.72			· 1/year
Naphthalene	0.07	0.16			1/year
Nitrobenzene	7.68	21.97		t	1/year

PARAMETER(S)	unless o	therwise ted DATLY MAXIMUM	CONCEN M unless st MONTHLY AVERAGE	S. T. T. T. F. R. C.	MEASUREMENT FREQUENCY
Phenanthrene	0.07	0.16			1/year
Pyrene	0.07	0.16			1/year
1,2,4-Trichlorobenzene	0.67	2.72			1/year
Biomonitoring (*2)	!		See Section D	See Section D	1/year

<u>Phase II</u>

PARAMETER (S)	unless	LBS/DAY therwise ted	MO unlèss o	FRATION, G/L otherwise	MEASUREMENT
	MONTHLY	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY **	
Flow, MGD	Report	Report			Continuous
pH Range Excursions No. of Events >60 minutes				0 (*1)	Continuous
pH Range Excursions Monthly Total Accumulated Time in Minutes				446 (*1)	Continuous
pH (Standard Units)			Report (*1) (Min)	Report (*1) (Max)	Continuous
TSS	202	653			1/week
Oil and Grease	38	57			1/week
тос	191	287			1/week

PARAMETER (S)	unless otherwise		MG/L unless otherwise stated		MEASUREMENT FREQUENCY	
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY	DAILY MAXIMUM		
Sulfite	153	306			. 1/week	
Total Arsenic	0.395	0.687			1/week	
Total Cadmium	0.746	1.339			1/week	
Total Chromium	0.926	1.650			1/week	
					1	
Total Copper	2.214	3.943			1/week	
Total Lead	0.748	1.333			1/week	
Total Mercury	0.251	0.447			1/week	
Total Silver	0.298	0.530			1/week	
Total Titanium	4.641	5.450			1/week .	
Total Zinc	1.830	3.311			l/week	
Acrylonitrile	0.36	0.89			1/year	
Benzene	0.22	0.51			1/year	
Carbon Tetrachloride	0.54	1.45			1/year	
Chlorobenzene	0.54	1.45			1/year	
Chloroethane	0.42	1.13			1/year	
Chloroform	0.42	1.24			1/year	

PARAMETER (S)	unless	LBS/DAY. otherwise	CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
1,1-Dichloroethane	0.08	0.23			1/year
1,2-Dichloroethane	0.69	2.20			1/year
1,1-Dichloroethylene	0.08	0.23			1/year
1,2-trans- Dichloroethylene	0.10	0.25			1/year
1,2-Dichloropropane	0.75	3.04			1/year
1,3-Dichloropropylene	0.75	3.04			1/year
Ethylbenzene	0.54	1.45			1/year .
Methyl Chloride	0.42	1.13			1/year
Methylene Chloride	0.14	0.65			1/year
Tetrachloroethylene	0.20	0.63			1/year
Toluene	0.11	0.28	-~-		1/year
1,1,1-Trichloroethane	0.08	0.23			1/year
1,1,2-Trichloroethane	0.12	0.49			1/year
Trichloroethylene	0.10	0.26			1/year
Vinyl Chloride	0.37	0.66			1/year
2,4-Dimethylphenol	0.07	0.18	~		1/year
4,6-Dinitro-o-Cresol	0.30	1.06	-		l/year
2,4-Dinitrophenol	4.62	16.43			1/year
2-Nitrophenol	0.25	0.88			1/year
4~Nitrophenol	0.62	2.21			1/year

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY	DAILY	MONTHLY AVERAGE	DAILY:	
Phenol	0.07	0.18		· •	1/year
Acenaphthene	0.07	0.18			1/year
Acenaphthylene	0.07	0.18			1/year
Anthracene	0.07	0.18			1/year
Benzo (a) anthracene	0.07	0.18			1/year
Benzo (a) pyrene	0.08	0.18			1/year
3,4-Benzofluoranthene	0.08	0.18			1/year
Benzo(k)fluoranthene	0.07	0.18			1/year
Bis(2- ethylhexyl)phthalate	0.36	0.99			1/year
Chrysene	0.07	0.18			1/year
1,2-Dichlorobenzene	0.75	3.04			1/year
1,3-Dichlorobenzene	0.54	1.45			1/year
1,4-Dichlorobenzene	0.54	1.45			1/year
Diethyl phthalate	0.18	0.43			1/year
Dimethyl phthalate	0.07	0.18			1/year
Di-n-butyl phthalate	0.08 4	0.16			1/year
Fluoranthene	0.08	0.21	All Augp-		1/year
Fluorene	0.07	0.18			1/year
Hexachlorobenzene	0.49 ı	1.18			1/year

PARAMETER (S)	MASS, LBS/DAY, unless otherwise stated		CONCENTRATION, MG/L unless otherwise		MEASUREMENT: FREQUENCY
	MONTHLY, AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Hexachlorobutadiene	0.54	1.45			1/year
Hexachloroethane	0.75	3.04			1/year
Naphthalene	0.07	0.18			1/year
Nitrobenzene	8.56	24.51			1/year
Phenanthrene	0.07	0.18			1/year
Pyrene	0.08	0.18		, -	1/year
1,2,4-Trichlorobenzene	0.75	3.04			1/year
Biomonitoring (*2)		<u></u>	See Section D	See Section D	1/year

Phase III

PARAMETER (S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L uniless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Flow, MGD	Report	Report			Continuous
pH Range Excursions No. of Events >60 minutes				0 (*1)	Continuous

PARAMETER(S)	unless otherwise unles		CONCENT MC unless	therwise	MEASUREMENT FREQUENCY
	MONTHLY	DAILY (MONTHLY AVERAGE	DAILY MAXIMUM	
pH Range Excursions Monthly Total Accumulated Time in Minutes	: :			446 (*1)	Continuous
рН (Standard Units)			Report (*1) (Min)	Report (*1) (Max)	Continuous
TSS	195	629			1/week
Oil and Grease	37	55			1/week
TOC	184	276			1/week
Sulfite	147	295			1/week
Total Arsenic	0.380	0.662			1/week
Total Cadmium	0.718	1.289			1/week
Total Chromium	0.891	1.588		-~-	1/week
Total Copper	2.132	3.796			1/week
Total Lead	0.720	1.284			1/week
Total Mercury	0.241	0.431			1/week
Total Silver	0.286	0.510			1/week
Total Titanium	4.469	5,248			1/week
Total Zinc	1.762	3.188			1/week
Acrylonitrile	0.35	0, 85			l/year
Benzene	0.21	0.49			1/year
Carbon Tetrachloride	0.52	1.40			1/year
Chlorobenzene	0.52	1.40			1/year
Chloroethane	0.41	1.09			1/year

PARAMETER(S)	MASS, I	therwise	CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Chloroform	0.41	1.20			l/year
1,1-Dichloroethane	0.08	0.22			1/year
1,2-Dichloroethane	0.66	2.11			1/year
1,1-Dichloroethylene	0.08	0.22			. 1/year
1,2~trans- Dichloroethylene	0.09	0.24			1/year
1,2-Dichloropropane	0.72	2.93			1/year
1,3-Dichloropropylene	0.72	2.93			1/year
Ethylbenzene	0.52 ⁱ	1.40			1/year
Methyl Chloride	0.41	1.09			1/year
Methylene Chloride	0.13	0.63			1/year
Tetrachloroethylene	0.19	0.60			1/year
Toluene	0.10	0.27			1/year
1,1,1-Trichloroethane	0.08	0.22			1/year
1,1,2-Trichloroethane	0.12	0.47			. 1/year
Trichloroethylene	0.10 ;	0.25			1/year
Vinyl Chloride	0.36	0.63			1/year
2,4-Dimethylphenol	0.07	0.17			1/year
4,6-Dinitro-o-Cresol	0.29	1.02			1/year
2,4-Dinitrophenol	4.45	15.81			1/year
2-Nitrophenol	0.24	0.85			1/year
4-Nitrophenol	0.60	2.12			1/year
Phenol	0.07	0.17			1/year
Acenaphthene -	0.07	0.17			1/year

PARAMETER (S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Acenaphthylene	0.07	0.17			1/year
Anthracene	0.07	0.17			1/year
Benzo (a) anthracene	0.07	0.17			1/year
Benzo (a) pyrene	0.07	0.18			1/year
3,4-Benzofluoranthene	0.07	0.18			1/year
Benzo(k)fluoranthene	0.07	0.17			1/year
Bis(2- ethylhexyl)phthalate	0.35	0.95	 -		1/year
Chrysene	0.07	0.17			1/year
1,2-Dichlorobenzene	0.72	2.93			1/year
1,3-Dichlorobenzene	0.52	1.40			1/year
1,4-Dichlorobenzene	0.52	1.40			1/year
Diethyl phthalate	0.17	0.42			1/year
Dimethyl phthalate	0.07	0.17			1/year
Di-n-butyl phthalate	0.07	0.16			1/year
Fluoranthene	0.08	0.20			1/year
Fluorene	0.07	0.17			1/year
Hexachlorobenzene	0.49	1.18			1/year
Hexachlorobutadiene	0.52	1.40			l/year
Hexachloroethane	0.72	2.93			1/year
Naphthalene	0.07	0.17			1/year
Nitrobenzene	8.24	23.59			1/year
Phenanthrene	0.07	0.17			1/year

PARAMETER (S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY	DAILY	MONTHLY	DAILY MAXIMUM	
Pyrene	0.07	0.18			1/year
1,2,4-Trichlorobenzene	0.72	2.93			1/year
Biomonitoring (*2)			See Section D	See Section D	1/year

<u>Phase IV</u>

PARAMETER (S)	MASS; LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Flow, MGD	Report	Réport			Continuous
pH Range Excursions No. of Events >60 minutes				0 (*1)	Continuous
pH Range Excursions - Monthly Total Accumulated Time in Minutes	;	· _ _ ·		446 (*1)	Continuous
pH (Standard Units)			Report (+1) (Min)	Report (*1) (Max)	Continuous
TSS.	205	661			1/week
Oil and Grease	39	58			1/week
TOC	194	291			1/week
Sulfite	155 '	310			1/week
Total Arsenic	0.400	0.696			1/week

PARAMETER(S)	MASS unless	LBS/DAY otherwise ated	CONCENTRATION, MG/L, unless otherwise		MEASUREMENT' FREQUENCY
	MONTHLY	DAILY	MONTHLY AVERAGE	DAILY MAXIMUM	
Total Cadmium	0.755	1.355			1/week
Total Chromium	0.937	1.670			l/week
Total Copper	2.242	3.992			1/week
Total Lead	0.758	1.350	,		l/week
Total Mercury	0.254	0.453	٠		1/week
Total Silver	0.301	0.536	-		1/week
Total Titanium	4.698	5.517			1/week
Total Zinc	1.853	3.352			1/week
Acrylonitrile	0.36	0.90		~	1/year
Benzene	0.22	0.52			1/year
Carbon Tetrachloride	0.55	1.47			1/year
Chlorobenzene	0.55	1.47			1/year
Chloroethane	0.43	1.14			1/year
Chloroform	0.43	126			 1/year
1,1-Dichloroethane	0.09	0.23			1/year
1,2-Dichloroethane	0.70	2.22			1/year
1,1-Dichloroethylene	0.09	0.23			1/year
1,2-trans- Dichloroethylene	0.10	0.26			1/year
1,2-Dichloropropane	0.76	3.08			1/year
1,3-Dichloropropylene	0.76	3.08			1/year
Ethylbenzene	0.55	1:47			1/year
Methyl Chloride	0.43	1,14			l/year

PARAMETER(S)	unless	LBS/DAY otherwise ated	CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DATLY	MONTHLY	.DAILY	
Methylene Chloride	0.14	0.66			1/year
Tetrachloroethylene	0.20	0.64	- 		1/year
Toluene	0.11	0.29			1/year
1,1,1-Trichloroethane	0.09	0.23			1/year
1,1,2-Trichloroethane	0.12	0.49			1/year
Trichloroethylene	0.10	0.27	'		1/year
Vinyl Chloride	0.38	0.67			1/year
2,4-Dimethylphenol	0.07	0.18			1/year
4,6-Dinitro-o-Cresol	0.30	1.07			1/year
2,4-Dinitrophenol	4.68	16.63			1/year
2-Nitrophenol	0.25	0.90			1/year
4-Nitrophenol	0.63	. 2.23	,		1/year
Phenol	0.07	0.18			1/year
Acenaphthene	0.07	0.18			- 1/year -
Acenaphthylene	0.07	0.18			1/year
Anthracene	0.07	0.18			1/year
Benzo (a) anthracene	0.07	0.18			1/year
Benzo (a) pyrene	0.08	0.19			1/year
3,4-Benzofluoranthene	0.08	0.19			1/year
Benzo(k)fluoranthene	0.07	0.18			1/year
Bis(2- ethylhexyl)phthalate	0.37	1.00			1/year
Chrysene	0.07	0.18			1/year

PARAMETER(S)	stated;		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY	
	MONTHLY AVERAGE	YLLAD MWIXAM	MONTHLY AVERAGE	DAILY MAXIMUM		
1,2-Dichlorobenzene	0.76	3.08		-,-	1/year	
1,3-Dichlorobenzene	0.55	1.47			1/year	
1,4-Dichlorobenzene	0.55	1.47			1/year	
Diethyl phthalate	0.18	0.44			1/year	
Dimethyl phthalate	0.07	0.18			1/year	
Di-n-butyl phthalate	0.08	0.17			1/year	
Fluoranthene	0.09	0.21			1/year	
Fluorene	0.07	0.18			1/year	
Hexachlorobenzene	0.49	1.18			1/year	
Hexachlorobutadiene	0.55	1.47			1/year	
Hexachloroethane	0.76	3.08			1/year	
Naphthalene	0.07	0.18			1/year	
Nitrobenzene .	8.67	24.82			1/year	
Phenanthrene	007	0.18	.	_~==	·1/year ·	
Pyrene	0.08	0.19	÷		1/year	
1,2,4-Trichlorobenzene	0.76	3.08			1/year	
Biomonitoring (*2)			See Section D	See Section D	1/year	

- (*1) The pH shall be within a range of 6.0 9.0 Standard Units at all times subject to the continuous monitoring pH range excursion provision in Part II.H of the draft permit.
- (*2) Biomonitoring shall be performed on a flow-weighted composite sample of the effluent from Outfalls 001, 002, and 003. The biomonitoring results for these outfalls shall be reported on the DMR as Outfall TX1.

Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.l.b. These requirements are consistent with the current permit.

pH - limits are established in accordance with LAC 33:IX.1113.C.1. These requirements are consistent with the current permit.

The basis of the allocations received for the discharges of furnace scrubber wastewater attributed to spent sulfuric acid regeneration (process wastewaters from the Acid Plant) and to the combustion of hazardous waste (treatment services waste) are discussed below. Based on the preamble to the final rule (65 Federal Register 4373 - 4374) for the effluent guidelines at 40 CFR 444 (Subpart A), "where a facility treats a Commercial Hazardous Waste Combustor waste stream and process wastewater from other industrial operations, the effluent guidelines would be applied using a flow-weighted combination of the BPT/BAT limitations for the Commercial Hazardous Waste Combustor and the other industrial operations to derive the appropriate limitations." Therefore, the proposed mass limits have been calculated using a sum of the flow-weighted allocations for each parameter. The fraction of the furnace scrubber wastewater attributed to spent sulfuric acid regeneration and to the combustion of hazardous waste of 89 percent and 11 percent, respectively, will be continued in the draft permit. These fractions have been used to determine the flow rates under the baseline conditions and for all of the phases.

Spent Sulfuric Acid Regeneration

Priority Metals - Process wastewaters from the Acid Plant and washwaters, process area stormwater, and lab wastewaters are included as part of the process wastewater stream and receive allocations for 8 of the 9 priority metals (Total Arsenic, Total Cadmium, Total Chromium, Total Copper, Total Lead, Total Mercury, Total Silver, and Total Zinc) regulated at 40 CFR 444, Subpart A (Commercial Hazardous Waste Combustors) by BPJ based on the concentration limits derived using a log normal distribution of the data taken from the Development Document for Effluent Limitation Guidelines and Standards for the Inorganic Chemicals Manufacturing Point Source Category (ICDD), EPA 440/1-82/007. The ICDD did not contain a BAT concentration value for Total Titanium. See Table 1 below for a list of the allocations. These concentration limits have been used to calculate the mass limits for these parameters. The methodology used to derive the mass limits for these parameters is consistent with the current permit.

Table 1. Allocations based on the ICDD

Priority Metal	Monthly Average (*1) (μg/L)	Daily Maximum (*1) $(\mu g/L)$
Total Arsenic	106.5	189.8
Total Cadmium	. 213	. 379.6
Total Chromium	266.3	474.5
Tötäl Copper	639	1138.8
Total Lead	213	379.6
Total Mercury	72.4	129.1
Total Silver	otal Silver 85.2	
Total Zinc	523.5	949

^(*) See the 1995 Fact Sheet for the basis of how these allocations were developed.

Total Titanium - Process wastewaters from the Acid Plant and washwaters, process area stormwater, and lab wastewaters are included as part of the process wastewater stream and receive allocations of 1.34 mg/L (monthly average) and 1.57 mg/L (daily maximum) by BPJ since the ICDD did not contain BAT concentration values for this parameter. [NOTE: The effluent guidelines at 40 CFR 444, Subpart A (Commercial Hazardous Waste Combustors) established BAT concentration limits for this parameter.] These allocations were derived using 95th and 99th percentile (log normal distribution of the data set) concentration values based on effluent data collected by the permittee (see Application Addendum dated February 22, 2002). These concentration limits have been used to calculate the mass limits for this parameter. The methodology used to derive the mass limits for this parameter is consistent with the current permit.

TSS - Process wastewaters from the Acid Plant and washwaters, process area stormwater, and lab wastewaters are included as part of the process wastewater stream and receive allocations of 54.75 mg/L (monthly average) and 176.75 mg/L (daily maximum) by BPJ based on the effluent guidelines at 40 CFR 414 (Organic Chemicals, Plastics, and Synthetic Fibers), Subparts E, F, G, and H. These concentration limits were calculated by taking into account equal fractions from each of the four subparts. See Table 2 below. These concentration limits have been used to calculate the mass limits for this parameter. The methodology used to derive the limits for this parameter is consistent with the current permit.

Table 2. Calculation of TSS Allocations

OCPSF Subpart	Subpart Fraction of Total OCPSF Production	Monthly Average	Daily Maximum	Weighted Monthly Average	Weighted Daily Maximum
E	0.25	67	216	16.75	54
F	0.25	46	149	11.5	37.25
G	0.25	49	159	12.25	39.75
Н .	0.25	57	183	. 14.25	45.75
	Tota	1		54.75	176.75

TOC - Process wastewaters from the Acid Plant and washwaters, process areastormwater, and lab wastewaters are included as part of the process wastewater stream and receive allocations of 50~mg/L (monthly average) and 75~mg/L (daily maximum) based on BPJ using previous permits. The methodology used to derive the mass limits for this parameter is consistent with the current permit.

Oil and Grease - Process wastewaters from the Acid Plant and washwaters, process area stormwater, and lab wastewaters are included as part of the process wastewater stream and receive allocations of 10 mg/L (monthly average) and 15 mg/L (daily maximum) based on BPJ using previous permits. The methodology used to derive the mass limits for this parameter is consistent with the current permit.

Sulfite - Process wastewaters from the Acid Plant and washwaters, process area stormwater, and lab wastewaters are included as part of the process wastewater stream and receive allocations of 40 mg/L (monthly average) and 80 mg/L (daily maximum) based on BPJ. The methodology used to derive the mass limits for this parameter is consistent with the current permit.

Combustion of 'Hazardous Waste

Priority Metals - Process wastewaters generated from the combustion of hazardous and non-hazardous waste receive allocations for 9 priority metals (Total Arsenic, Total Cadmium, Total Chromium, Total Copper, Total Lead, Total Mercury, Total Silver, Total Zinc, and Total Titanium) based on the effluent guidelines at 40 CFR 444, Subpart A (Commercial Hazardous Waste Combustors). These concentration limits have been used to calculate the mass limits for these parameters. The methodology used to derive the mass limits for these parameters is consistent with the current permit.

TSS - Process wastewaters generated from the combustion of hazardous and non-hazardous waste receive allocations of 34.8~mg/L (monthly average) and 113~mg/L (daily maximum) based on the effluent guidelines at 40~CFR 444,

Subpart A (Commercial Hazardous Waste Combustors). These concentration limits have been used to calculate the mass limits for this parameter. The methodology used to derive the mass limits for this parameter is consistent with the current permit.

TOC - Process wastewaters generated from the combustion of hazardous and non-hazardous waste receive allocations of 50 mg/L (monthly average) and 75 mg/L (daily maximum) based on BPJ using previous permits. These concentration limits have been used to calculate the mass limits for this parameter. The methodology used to derive the mass limits for this parameter is consistent with the current permit.

Oil and Grease - Process wastewaters generated from the combustion of hazardous and non-hazardous waste receive allocations of 10 mg/L (monthly average) and 15 mg/L (daily maximum) based on BPJ using previous permits. These concentration limits have been used to calculate the mass limits for this parameter. The methodology used to derive the mass limits for this parameter is consistent with the current permit.

Sulfite - Process wastewaters generated from the combustion of hazardous and non-hazardous waste receive allocations of 40 mg/L (monthly average) and 80 mg/L (daily maximum) based on BPJ. These concentration limits have been used to calculate the mass limits for this parameter. The methodology used to derive the mass limits for this parameter is consistent with the current permit.

Priority Organics

The combined discharge of process wastewaters from the Acid Plant (including washwaters, process area stormwater, and lab wastewaters) and process wastewaters generated from the combustion of hazardous and non-hazardous-waste receive allocations for the priority organics based on the effluent guideline at 40 CFR 414 (Organic Chemicals, Plastics, and Synthetic Fibers), Subpart J using the total process wastewater flow rates under the Baseline Conditions (0.385576 MGD), Phase I (0.411496 MGD), Phase II (0.459016 MGD), Phase III (0.441736 MGD), and Phase IV (0.464776 MGD). These concentration limits have been used to calculate the mass limits for these parameters. The methodology used to derive the mass limits for these parameters is consistent with the current permit.

Monitoring Frequency Reduction

A monitoring frequency reduction for TSS, TOC, Oil and Grease, and Sulfite from three times per week to once per week has been granted in accordance with the <u>Interim Guidance for Performance-Based Reduction of NPDES Permit Monitoring Frequencies (April 1996)</u> based on information provided in the 2007 Application. See Appendix D for the Monitoring Frequency Reduction Analysis.

2. Outfall 002 - treated combined cooling tower blowdown; process area stormwater runoff; mechanical equipment cooling water; SO₃ (Oleum) tank scrubber wastewater; miscellaneous cooling water; washdown; condensate; car wash wastewater; maintenance wastewaters (comprised of fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); hydrostatic test wastewater; and previously monitored wastewater from Internal Outfall 102 (treated sanitary wastewater)

These discharges shall receive the following limits and monitoring requirements:

PARAMETER(S)	MONTHLY	DAILY	unless o	rion, MG/L therwise ted DAILY	MEASUREMENT: FREQUENCY
	AVERAGE .	MAXIMUM	'AVERAGE'	MAXIMUM	
Flow, MGD	Report _!	Report			Continuous
pH Range Excursions No. of Events >60 minutes	;			0 (*1)	Continuous
pH Range Excursions Monthly Total Accumulated Time in Minutes	(446 (*1)	Continuous
pH (Standard Units)	;		Report	Report	Continuous
,			. (*1)	(*1)	
			(Min)	(Max)	
TOC	(50	1/week
Oil & Grease			10	15	1/month
Total Zinc			0.5	0.9	1/month
Biomonitoring (*2)		 -	See Section D	See Section D	1/year

- (*1) The pH shall be within a range of 6.0 9.0 Standard Units at all times subject to the continuous monitoring pH range excursion provision in Part II.H of the draft permit.
- (*2) Biomonitoring shall be performed on a flow-weighted composite sample of the effluent from Outfalls 001, 002, and 003. The biomonitoring results for these outfalls shall be reported on the DMR as Outfall TX1.

Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.1.b. These requirements are consistent with the current permit.

TOC and Oil and Grease - concentration limits are established based on BPJ using previous permits. These requirements are consistent with the current permit.

Total Zinc - concentration limits are established using the 95th and 99th percentile (log normal distribution of the data set) as the monthly average and daily maximum, respectively, by BPJ based on sample data reported on the permittee's DMRs for the period of June 2004 through December 2008. See Appendix F.

pH - limits are established in accordance with LAC 33:IX.1113.C.1. These requirements are consistent with the current permit.

Monitoring Frequency Reduction

A monitoring frequency reduction for Oil and Grease from once per week to once per month in accordance with the <u>Interim Guidance for Performance-Based Reduction of NPDES Permit Monitoring Frequencies (April 1996)</u> will be partially granted per department discretion. See Appendix D for the Monitoring Frequency Reduction Analysis.

3. Internal Outfall 102 - treated sanitary wastewater

These discharges shall receive the following limits and monitoring requirements:

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRA unless	MEASUREMENT FREQUENCY	
	MONTHLY WAVERAGE	WEEKLY AVERAGE	MONTHLY AVERAGE	WEEKLY AVERAGE	WEEKLY AVERAGE
Flow, MGD	}	Report			1/6 months
BOD ₅	;		.30	45	1/6 months
TSS	;		30	45	1/6. months
Fecal Coliform colonies/100ml		- 	200	400(*1)	1/6 months

^(*1) Shall be reported as a daily maximum in lieu of a weekly average.

Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.1.b. These requirements are consistent with the current permit.

 BOD_5 , TSS, and Fecal Coliform - limits are established in accordance with the LDEQ Sanitary Discharge General Permits. These requirements are consistent with the current permit.

4. Outfall 003 - treated combined process wastewater (Cathyval Plant) which includes the Vanessa, Daphne, and Cathy Units; process area stormwater runoff; cooling tower blowdown; laboratory wastewater (Cathyval Plant); maintenance wastewaters (comprised of fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); non-process area stormwater (on an emergency basis only); and hydrostatic test wastewater

Rhodia Inc., Baton Rouge Plant (Vanillin Plant) is subject to New Source Performance Standards (NSPS) effluent limitation guidelines listed below:

Guideline

Organic Chemicals, Plastics, and Synthetic Fibers

Reference

40 CFR 414, Subparts H and I

Calculations, results, and documentation for the technology-based mass limits for the Priority Pollutants are found at Appendices A-6 and A-7. See below for site-specific considerations.

These discharges shall receive the following limits and monitoring requirements:

PARAMETER (S)	MASS LL unless ot stat	BS/DAY herwise	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	rion MG/L therwise ted	MEASUREMENT
	MONTHLY AVERAGE	DATLY. MAXIMUM	MONTHLY 7	DAILY MAXIMUM	
Flow, MGD	Report	Report			Continuous
pH Range Excursions No. of Events >60 minutes				0 (*1)	Continuous
pH Range Excursions Monthly Total Accumulated Time in Minutes	 			446 (*1)	Continuous

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY	
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY		
pH (Standard Units)			Report (*1) (Min)	Report (*1) (Max)	Continuous	
BOD ₅	321 ,	855		·	1/week	
TSS	423	1357			3/week	
TOC	2003	4006			1/week	
Ammonia Nitrogen	}	~	10	15	1/week	
Total Nickel	5.69	13.39			1/week	
Total Cobalt			Report	Report	1/quarter	
Acrylonitrile	0.60	1.51			1/year	
Benzene	0.23	0.85			1/year	
Carbon Tetrachloride	0.11	0.24			1/year	
Chlorobenzene	0.09	0.17			1/year	
Chloroethane	0.65	1.67			1/year	
Chloroform	0.13	0.29			1/year	
1,1-Dichloroethane	0.14	0.37			1/year	
1,2-Dichloroethane	0.42	1.32			1/year	
1,1-Dichloroethylene	0.10	0.16			1/year	
1,2-trans- Dichloroethylene	0.13	0.34			1/year	
1,2-Dichloropropane	0.95	1.44			1/year	
1,3-Dichloropropylene	0.18	0.27			1/year	
Ethylbenzene	0.20	0.67			1/year	
Methyl Chloride	0.54	1.19			1/year	
Methylene Chloride	0.25	0.56			1/year	

PARAMETER (S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE.	DAILY MAXIMUM	MONTHLY AVERAGE	DATLY MAXIMUM	
Tetrachloroethylene	0.14	0.35			1/year
Toluene	0.16	0.50			1/year
1,1,1-Trichloroethane	0.13	0.34	·		1/year
1,1,2-Trichloroethane	0.13	0.34			1/year
Trichloroethylene	0.13	0.34			1/year
Vinyl Chloride	0.65	1.67			1/year
2-Chlorophenol	0.19	0.61			1/year
2,4-Dichlorophenol	0.24	0.70			1/year
2,4-Dimethylphenol	0.11	0.22			1/year
4,6-Dinitro-o-Cresol	0.49	1.73			1/year
2,4-Dinitrophenol	0.44	0.77			1/year
2-Nitrophenol .	0.26	0.43			1/year
4-Nitrophenol	0.45	0.77			l/year
Phenol '	0.09	0.16			1/year
Acenaphthene	0:14	0:37		• • • • •	1/year
Acenaphthylene	0.14	0.37			1/year
Anthracene	0.14	0.37			1/year
Benzo (a) anthracene	0.14	0.37			l/year
Benzo (a) pyrene	0.14	0.38			.1/year
3,4-Benzofluoranthene	0.14	0.38			1/year
Benzo(k) fluoranthene	0.14	0.37			1/year
Bis(2- ethylhexyl)phthalate	0.64	1.74			1/year
Chrysene	0.14	0.37			1/year
1,2-Dichlorobenzene	0.48	1.02			1/year

PARAMETER(S)	MASS L unless of	herwise	CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY.	MONTHLY AVERAGE	DAILY MAXIMUM	
1,3-Dichlorobenzene	0.19	0.27			1/year
1,4-Dichlorobenzene	- 0.09	0.17			1/year
Diethyl phthalate	. 0.51	1.27			1/year
Dimethyl phthalate	0.12	0.29		,	1/year
Di-n-butyl phthalate	0.17	0.¦36			1/year
2,4-Dinitrotoluene	0.71	1.,78			1/year
2,6-Dinitrotoluene	1.59	4.00			1/year
Fluoranthene	0.16	0.42			1/year
Fluorene	0.14	0.37			1/year
Hexachlorobenzene	0.09	0.17			1/year
Hexachlorobutadiene	0.12	0.31			1/year
Hexachloroethane	0.13	0.34			1/year
Naphthalene	0.14	0.37			1/year
Nitrobenzene	0.17	0.42			1/year .
-Phenanthrene	0.14	- 0.37	٠		1/year
Pyrene ·	0.16	0.42			1/year
1,2,4-Trichlorobenzene	0.42	0.87			1/year
Biomonitoring (*2)	·		, See Section D	See Section D	1/year

^(*1) The pH shall be within a range of 6.0 - 9.0 Standard Units at all times subject to the continuous monitoring pH range excursion provision in Part II.H of the draft permit.

^(*2) Biomonitoring shall be performed on a flow-weighted composite sample of the effluent from Outfalls 001, 002, and 003. The biomonitoring results for these outfalls shall be reported on the DMR as Outfall TX1.

Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.1.b. These requirements are consistent with the current permit.

pH - limits are established in accordance with LAC 33:IX.1113.C.1. These requirements are consistent with the current permit.

BOD₅ - The effluent guidelines under which the permittee's process wastewater is regulated does not include BOD₅ allocations for maintenance and utility wastewaters. Therefore, maintenance and utility wastewaters have been included as a part of the process wastewater stream and receive allocations for BOD₅ of 50 percent of the effluent guidelines at 40 CFR 414, Subpart H. The methodology used to derive the mass limits for this parameter is consistent with the current permit.

TSS - The effluent guidelines under which the permittee's process wastewater is regulated does not include TSS allocations for maintenance and utility wastewaters. Therefore, maintenance and utility wastewaters have been included as a part of the process wastewater stream and receive allocations for TSS of 50 percent and 100 percent, respectively, of the effluent guidelines at 40 CFR 414, Subpart H. The methodology used to derive the mass limits for this parameter is consistent with the current permit.

Total Nickel - Process wastewaters (high salt wastewater) generated from the Vanessa Unit based on the use of nickel as a catalyst in the manufacturing process receive allocations of 1.69 mg/L (monthly average) and 3.98 mg/L (daily maximum) by BPJ using 40 CFR 414.91 (Direct Discharge Point Source That Use End-of-Pipe Biological Treatment). This limit is only applicable when a nickel catalyst is used. These concentration limits have been used to calculate the mass limits for this parameter. The methodology used to derive the mass limits for this parameter is consistent with the current permit.

Total Cobalt - A monitoring requirement will be established for data gathering purposes since the permittee uses a cobalt-containing catalyst in the manufacturing process at the Vanessa Unit. The sample values provided in the 2007 Application reported an effluent concentration of 0.94 mg/L and a mass loading of 5.9 lbs/day for this pollutant.

Ammonia Nitrogen - Concentration limits of 10 mg/L (monthly average) and 15 mg/L (daily maximum) are based on BPJ using previous permits. These limits are consistent with the current permit.

TOC - The allocations for this parameter of 250 mg/L (monthly average) and 500 mg/L (daily maximum) are based on BPJ using previous permits. These concentration limits have been used to calculate the mass limits for this

parameter. The methodology used to derive the limits for this parameter is consistent with the current permit.

Priority Organics - The allocations for these parameters are based on the effluent guidelines at 40 CFR | 414 (Organic Chemicals, Plastics, and Synthetic Fibers), Subpart' I using the total process wastewater flow rate (0.7483 MGD). These concentration limits have been used to calculate the mass limits for this parameter. The methodology used to derive the limits for these parameters is consistent with the current permit.

Monitoring Frequency Reduction

A monitoring frequency reduction for BOD, and TOC from three times per week to once per week has been granted in accordance with the <u>Interim Guidance for Performance-Based Reduction</u> of NPDES Permit Monitoring Frequencies (April 1996) based on information provided in the 2007 Application. See Appendix D for the Monitoring Frequency Reduction Analysis.

5. Outfall 004 - non-process area stormwater runoff from the Cathyval Plant; maintenance wastewaters (comprised of fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); and previously monitored wastewater from Internal Outfall 117 (hydrostatic test wastewater)

These discharges shall receive the following limits and monitoring requirements:

PARAMETER (S)	MASS, LBS/I OTHERWISE MONTHLY AVERAGE	stated	unless	therwise	MEASUREMENT FREQUENCY
Flow, MGD	Report,	Report			1/month
тос	;			50	1/month
Oil & Grease				15	1/month
Total Zinc				0.676	1/month
pH Standard Units	-	-	6.0 (min)	9.0 (max)	1/month

<u>Site-Specific Consideration(s)</u>

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.1.b. These requirements are consistent with the current permit.

TOC and Oil and Grease - Concentration limits are established by BPJ using the current permit and the LDEQ Stormwater Guidance. These requirements are consistent with the current permit.

Total Zinc - The concentration limit is established based on BPJ using previous permits. These requirements, are consistent with the current permit.

pH - limits are established in accordance with LAC 33:IX.1113.C.1. These requirements are consistent with the current permit.

6. Outfall 014 - non-process area stormwater runoff; maintenance wastewaters (comprised of well water, fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); and previously monitored wastewater from Internal Outfall 117 (hydrostatic test wastewater)

These discharges shall receive the following limits and monitoring requirements:

PARAMETER(S)	MASS, LBS/I	stated	unless	TION, MG/L therwise ited DAILY MAXIMUM	MEASUREMENT
Flow, MGD	Report !	Report			1/quarter
TOC				50	1/quarter
Oil & Grease				15	1/quarter
pH Standard Units			6.0 (min)	9.0 (max)	1/quarter.

Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.l.b. These requirements are consistent with the current permit:

TOC and Oil and Grease - limits are established by BPJ using the current permit and the LDEQ Stormwater Guidance. These requirements are consistent with the current permit.

pH - limits are established in accordance with LAC 33:IX.1113.C.1. These requirements are consistent with the current permit.

7. Outfalls 015 - non-process area stormwater runoff; maintenance wastewaters (comprised of well water, fire protection system test water, wastewater from the eye wash stations and safety showers, and cooling tower drift); and previously monitored wastewater from Internal Outfalls 215 (treated sanitary wastewater) and 315 (hydrostatic test wastewater)

These discharges shall receive the following limits and monitoring requirements:

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRA unless	MEASUREMENT FREQUENCY	
	MONTHLY	DAILY	MONTHLY AVERAGE	DAILY MAXIMUM	
Flow, MGD	Report	Report			1/month
TOC		.		50	1/month
Oil & Grease	!			15	1/month
Total Zinc				1.70	1/month
Total Lead	!			0.38	1/month
pH Standard Units	;		6.0 (min)	9.0 (max)	1/month

Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.1.b. These requirements are consistent with the current permit.

TOC and Oil and Grease - Concentration limits are established by BPJ using the current permit and the LDEQ Stormwater Guidance. These requirements are consistent with the current permit.

Total Zinc - The concentration limit is established by BPJ using the current permit. This requirement are consistent with the current permit.

Total Lead - The concentration limit is established by BPJ using the concentration limit (log normal distribution) derived from the Development Document for Effluent Limitation Guidelines and Standards for the Inorganic Chemicals Manufacturing Point Source Category (ICDD), EPA 440/1-82/007. This determination is based on sample data (260 μ g/L) reported in the permittee's 2007 Application which showed that this pollutant is approaching treatable levels.

pH - limits are established in accordance with LAC 33:IX.1113.C.1. These requirements are consistent with the current permit.

Facility Specific SWP3 Conditions: The permittee shall visually inspect and sample the sump contents associated with the Trailer Staging Area (TSA) for compliance with a COD [limit of 125 mg/L and pH limits of 6.0 - 9.0 s.u. prior to discharging any of the sump contents to the drainage point which flows to this outfall. In the event that the contents of the sump are not in compliance with the limits listed above, the sump contents shall be removed and managed either through Outfall 001 or placed in a permitted hazardous waste storage tank for incineration. Liquids draining to the sump will be removed immediately upon discovering any spillage from tanker trailers or within 72 hours of collecting stormwater.

Storm Water Pollution Prevention Plan (SWP3) Requirements

In accordance with LAC 33:IX.2707.I.3 and 4 [40 CFR 122.44(I)(3) and (4)], a Part II condition is proposed for applicability to all storm water discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. The Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit, along with other requirements. If the permittee maintains other plans that contain duplicative information, those plans could be incorporated by reference to the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasures Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of stormwater associated with industrial activity, as defined in LAC 33:IX.2522.B.14 [40 CFR 122.26(b)(14)].

7. Internal Outfall 215 - treated sanitary wastewater

This discharge shall receive the following limits and monitoring requirements:

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	WEEKLY AVERAGE	MONTHLY AVERAGE	WEEKLY AVERAGE	WEEKLY AVERAGE
Flow, MGD	Report	Report			1/6 months
BOD ₅				45	1/6 months
TSS				45	1/6 months

PARAMETER(S)	MASS, LBS/I	stated	The second second	therwise	MEASUREMENT
	1 5.0		MONTHLY AVERAGE		WEEKLY AVERAGE
Fecal Coliform colonies/100 ml				400 (*1)	1/6 months

(*1) Shall be reported as a daily maximum in lieu of a weekly average.

Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.1.b. These requirements are consistent with the current permit.

BOD, TSS, and Fecal Coliform - limits are established in accordance with the LDEQ Sanitary Discharge General Permits. These requirements are consistent with the current permit.

8. Outfall 016 - treated sanitary wastewater

This discharge shall receive the following limits and monitoring requirements:

PARAMETER (S)	MASS, LBS/	DAY unless	CONCENTRATION MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY	WEEKLY	MONTHLY	WEEKLY	WEEKLY AVERAGE
Flow, MGD	Report	Report			1/6 months
BOD,	!			45	1/6 months
TSS				45	1/6 months
Fecal Coliform colonies/100 ml				400 (*1)	1/6 months
pH Standard Units			6.0 (min)	9.0 (max)	1/6 months

(*1) Shall be reported as a daily maximum in lieu of a weekly average.

Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.1.b. These requirements are consistent with the current permit.

 BOD_5 , TSS, and Fecal Coliform - limits are established in accordance with the LDEQ Sanitary Discharge General Permits. These requirements are consistent with the current permit.

pH - limits are established in accordance with LAC 33:IX.1113.C.1. These requirements are consistent with the current permit.

9. Internal Outfall 117 - hydrostatic test wastewater

This discharge shall receive the following limits and monitoring requirements:

PARAMETER (S)	MASS, LBS/DAY unless otherwise stated				MEASUREMENT FREQUENCY (*3)
	MONTHLY AVERAGE (*1)	DAILY MAXIMUM (*2)	MONTHLY	DATLY MAXIMUM (*2)	
Flow, MGD	Report	Report			1/event
TSS (*4)(*5)	1			90	1/event
Oil & Grease				15	1/event
-TOC (*5)-				-50	1/event
Benzene (*5)				50 μg/L	1/event
Total BTEX (*5)(*6)				250 μg/L	1/event
Total Lead (*5)	(50 μg/L	1/event

- (+1) The month with the highest monthly average flow shall be reported.
- (*2) The highest result from an individual hydrostatic test must be reported.
- (*3) Monitoring is required once prior to proposed discharge.

- (*4) Report the TSS concentration of the intake on the DMR along with the concentration of TSS in the effluent, if the effluent is being returned to the same water source from which the intake water was obtained. In these cases, concurrent sampling of the influent and the effluent is required, and the net value shall not exceed 90 mg/L.
- (*5) Flow, TSS, Oil and Grease, and pH shall be measured on discharges from all new and existing pipelines, flowlines, vessels, or tanks. In addition, Total Organic Carbon (TOC) shall be measured on discharges from existing pipelines, flowlines, vessels, or tanks which have previously been in service; (i.e., those which are not new). Benzene, Total BTEX, and Total Lead shall be measured on discharges from existing pipelines, flowlines, vessels, or tanks which have been used for the storage or transportation of liquid or gaseous petroleum hydrocarbons.
- (*6) BTEX shall be measured as the sum of benzene, toluene, ethylbenzene, ortho-xylene, and para-xylene as quantified using methods prescribed by the latest approved 40 CFR 136, Tables, A-G.

Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.l.b. and are consistent with the Hydrostatic Test General Permit (LAG670000):

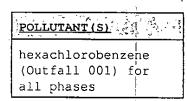
TSS, Oil and Grease, TOC, Benzene, Total BTEX, and Total Lead - limits have been established by BPJ and are consistent with the Hydrostatic Test General Permit (LAG670000).

C. WATER OUALITY-BASED EFFLUENT LIMITATIONS

Technology-based effluent limitations and/or specific analytical results from the permittee's application were screened against state water quality numerical standard based limits by following guidance procedures established in the <u>Permitting Guidance Document for Implementing Louisiana Surface Water Ouality Standards</u>, LDEQ, April 16, 2008.

In accordance with LAC 33:IX.2707.D.1/40 CFR § 122.44(d)(1), the existing (or potential) discharge (s) was evaluated in accordance with the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, LDEQ, April 16, 2008, to determine whether pollutants would be discharged "at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any state water quality standard." Calculations, results, and documentation based on the baseline conditions and for all of the phases are given in Appendices B-1 through B-6.

The following pollutant received water quality based effluent limits:



Minimum quantification levels (MQLs) for state water quality numerical standards-based effluent limitations are set at the values listed in the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, LDEQ, April 16, 2008. They are also listed in Part II of the permit.

TMDL Waterbodies

Subsegment No. 070201 of the Mississippi River Basin is not listed on the 2006 Final Integrated 303(d) List as being impaired.

Subsegment No. 070504 of the Mississippi River Basin is listed on the 2006 Final Integrated 303(d) List as being impaired with dissolved oxygen (DO) and Chlorine. The TMDL assessments for this subsegment are scheduled to be completed by 2010-2011. Based on an evaluation of the discharges, it was determined that the permittee has a small potential to discharge constituents that could contribute to the impairment for DO. However, the permittee does not have the potential to discharge constituents at a level that could contribute to the impairment for Chlorine. Therefore, the limit and monitoring requirement for TOC will be retained in the draft permit.

A reopener clause will be established in Part II of the permit to allow for more stringent or additional limitations or requirements to be placed in the permit, if needed, as a result of a future TMDL.

D. <u>Biomonitoring Requirements</u>

It has been determined that there may be pollutants present in the effluent which may have the potential to cause toxic conditions in the receiving stream. The State of Louisiana has established a narrative criteria which states, "toxic substances shall not be present in quantities that alone or in combination will be toxic to plant or animal life." The Office of Environmental Services requires the use of the most recent EPA biomonitoring protocols. See Appendix C for the Biomonitoring Recommendation.

Whole effluent biomonitoring is the most direct measure of potential toxicity which incorporates both the effects of synergism of effluent components and receiving stream water quality characteristics. Biomonitoring of the effluent is, therefore, required as a condition of this permit to assess potential! toxicity. The biomonitoring procedures stipulated as a condition of this permit for Outfall(s) Outfalls 001, 002, and 003 are as follows:

TOXICITY TESTS

FREQUENCY

Acute static renewal 48-hour definitive toxicity test using <u>Daphnia pulex</u>

1/year

Acute static renewal 48-hour definitive toxicity test using fathead minnow (Pimephales promelas)

1/year

Toxicity tests shall be performed in accordance with protocols described in the latest revision of the "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms." The stipulated test species are appropriate to measure the toxicity of the effluent consistent with the requirements of the State water quality standards. The biomonitoring frequency has been established to reflect the likelihood of ambient toxicity and to provide data representative of the toxic potential of the facility's discharge in accordance with regulations promulgated at LAC 33:IX.2715/40 CFR Part 122.48.

Results of all dilutions as well as the associated chemical monitoring of pH, temperature, hardness, dissolved oxygen, conductivity, and alkalinity shall be documented in a full report according to the test method publication mentioned in the previous paragraph. The permittee shall submit a copy of the first full report to the Office of Environmental Compliance. The full report and subsequent reports are to be retained for three (3) years following the provisions of Part III.C.3 of this permit. The permit requires the submission of certain toxicity testing information as an attachment to the Discharge Monitoring Report.

This permit may be reopened to require effluent limits, additional testing, and/or other appropriate actions to address toxicity if biomonitoring data show actual or potential ambient toxicity to be the result of the permittee's discharge to the receiving stream or water body. Modification or revocation of the permit is subject to the provisions of LAC 33:IX.3105/40 CFR 124.5. Accelerated or intensified toxicity testing may be required in accordance with Section 308 of the Clean Water Act.

<u>Dilution Series</u>

The permit requires toxicity testing under the baseline conditions and for all of the phases. The dilution series for each phase will consist of five (5) dilutions in addition to the control (0% effluent) which will be used in the toxicity tests. The effluent concentrations shall be 0.03%, 0.05%, 0.06%, 0.08%, and 0.1%. The low-flow effluent concentration (biomonitoring critical dilution) is defined as 0.08% effluent.

X. Compliance History/DMR Review:

- A. LDEQ records were reviewed for the period of March 2007 through March 2009. No water enforcement actions were issued during this time period.
- B. A DMR review of the monitoring reports covering the monitoring period of May 2004 through January 2009 revealed the following effluent violations:

DATE	PARAMETER	OUTFALL	REPORTED VALUE	PERMIT LIMITS
01/09	TSS	003	1918.7 lbs/day	1357 lbs/day
10/08	TSS	003	1694.7 lbs/day	1357 lbs/day
09/08	T' Zinc	015	2.66 mg/L	1.70 mg/L
09/08	рН	015	0.9 s.u.	6.0 s.u. (Min)
06/08	pH >60 min.	001	0 occur/month	1 occur/month
12/07	Fecal Coliform	215	>2,000 Col/100 ml	400 COL/100 ml
12/07	TSS	003	1777.6 lbs/day	1357 lbs/day
01/07	Ammonia Nitrogen	003	18.3 mg/L	15 mg/L
11/06	TSS	003	2227.5 lbs/day	1357 lbs/day
08/05	TSS	003	5015.6 lbs/day	1357 lbs/day
05/05	Total Zinc	004	0.903.1bs/day	0.676 lbs/day

C. The most recent inspection was conducted on July 29, 2008. The only item of concern noted in the report was related to effluent violations found during a DMR review.

XI. "IT" Questions - Applicant's Responses

The "IT" Questions along with the permittee's responses can be found in the 2007 Application. See Appendix \dot{E} .

XII. Endangered Species:

The receiving waterbody in Subsegment No. 070201 of the Mississippi River Basin has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. However, the receiving waterbody in Subsegment No. 070504 of the Mississippi River Basin is not listed in Section II.2 of Implementation Strategy as requiring consultation with the FWS. draft permit has been submitted to the FWS for review in accordance with a.letter dated.November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and after consultation with FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as Therefore, the issuance of the LPDES permit is not aquatic habitat. likely to have an adverse effect on any endangered or candidate species or the critical habitat.

XIII. Historic Sites:

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

XIV. Tentative Determination:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

XV. Variances:

No requests for variances have been received by this Office.

XVI. Public Notices:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the fact sheet. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List